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-and-

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d/b/a GE Appliances*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	:
	:
SEARS HOLDINGS CORPORATION, <i>et al.</i> ,	:
	:
	:
Debtors.	:
-----X	

Chapter 11
Case No. 18-23538 (RDD)
(Jointly Administered)

NOTICE OF LIMITED WITHDRAWAL

Haier US Appliance Solutions, Inc. d/b/a GE Appliances (“GEA”), by and through its undersigned counsel, hereby files this Notice of Withdrawal, and states as follows:

1. GEA has agreed to the assumption and assignment of the Replacement Contract between it and A&E Factory Service, LLC (as defined in the Notice of Corrected Exhibit to Notice of Assumption of Assignment of Additional Executory Contracts (ECF No. 4547)).

2. GEA withdraws the portions of its Reservation of Rights (ECF No. 3902) (the “Reservation”) and its Objection (ECF No. 1860) (the “Objection”) that object to the assumption

and assignment of the Replacement Contract. GEA reserves all rights in connection with the other agreements and matters referenced in the Objection or the Reservation.

3. GEA holds claims against the Debtors, and it reserves its rights in connection with those claims, including but not limited to all reclamation claims, administrative claims (including those under 11 U.S.C. § 503(b)(9)) or in connection with any prepetition or post-petition transactions, and all prepetition or post-petition claims of any type. GEA also reserves all rights in connection with any claims made by the Debtors.

WHEREFORE, GEA withdraws the limited portions of the Objection and the Reservation as set forth herein and reserves all other rights and requests the Court award it such other and further relief as the Court deems just and proper.

Dated: New York, New York
July 22, 2019

**KLESTADT WINTERS JURELLER
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